

## REMARKS

Reconsideration of this application, as amended, is respectfully requested. The following remarks are responsive to the Office Action mailed December 31, 2003.

### Objections to the Specification

The specification has been amended to address the objections of the Examiner, namely "the frequently of a" in the first full paragraph on Page 11 has been amended to read, "the frequency in which a".

### 35 U.S.C. 102 Rejections

Claims 1, 7, and 13 are rejected under 35 U.S.C. §102(e) as being anticipated by Leung (US 6,636,498). Particularly, it is asserted in the Office Action that Leung discloses all claim limitations, including a "protocol independent bridge device driver". It is respectfully asserted, however, that Leung does not teach a bridge device driver that is independent of the network protocol as in presently amended claims 1, 7, and 13.

Although Leung teaches that the Mobile IP router can be a bridge (see Column 17, Lines 60-62), as the Office Action points out, Leung does not teach, as claimed in presently amended claims 1, 7, and 13, that the bridge is independent of the network protocol used in the system. Indeed, throughout Leung only an Internet Protocol (IP) is taught that uses IP addresses to track locations of the mobile router and the networks through which the mobile router passes. Specifically, Leung teaches using "care-of addresses" to forward information to a mobile router and/or agent within one of the router's networks, and that these "care-of addresses" are an IP address (see Column 7, Lines 51-55). However, nowhere, does Leung teach that either the care-

of addresses or any address associated with the networks discussed in Leung use any other addressing or protocol than those associated with an Internet Protocol.

Applicant, on the other hand, claims in presently amended claims 1, 7, and 13 that the bridge device driver used to interface a protocol stack to various network interfaces is independent of the protocol being used. Moreover, Applicant states in the "Detailed Description" portion of his Application that an artisan may replace the TCP/IP protocol stack with other protocol stacks, including, but not limited to, IPX and Netbeui (see Page 18, Lines 15, 16) and still be able to interface these protocols with the network protocol independent device driver claimed in presently amended claims 1, 7, and 13.

Because the mobile IP router taught by Leung does not disclose that the router is independent of network protocols, as claimed in presently amended claims 1, 7, and 13 in regard to the bridge device driver, these claims cannot be anticipated by Leung.

Accordingly, Applicant respectfully asserts that claims 1, 7, and 13, and the claims dependent from these independent claims, are in condition for allowance.

### 35 U.S.C. §103 Rejections

Claims 2, 6, 8, 12, 14, and 18 are rejected under 35 U.S.C. §103(a) as being unpatentable over Leung in view of Machin et al. (US 6,243,753) (hereafter "Machin"). Furthermore, claims 3, 9 and 15 are rejected under 35 U.S.C. §103(a) as being unpatentable over Leung in view of Machin and further in view of Shannon (US 6,233,618). Lastly, claims 4, 5, 10, 11, 16 and 17 are rejected under 35 U.S.C. §103(a) as being unpatentable over Leung in view of Machin and further in view of Hoare et al (US 4,627,052) (hereafter "Hoare").

In light of the above discussion in regard to presently amended claims 1, 7, and 13, it is respectfully asserted by Applicant that Leung does not teach the limitation of these claims related to a "network protocol independent bridge device driver", Leung cannot be asserted as a basis for a rejection under 35 U.S.C. 103(a) in combination with either Machin, Shannon, or Hoare. Similarly, the claims that depend from claims 1, 7, and 13 cannot be rejected under 35 U.S.C. 103(a).

Accordingly, it is respectfully asserted by Applicant that claims 2, 4, 5, 6, 8, 10, 11, 12, 14, 16, 17, and 18 are in condition for allowance.

If there are additional fees due, please charge them to our Deposit Account No. 02-2666.

Respectfully submitted,

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